

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)
v.)
PATRICK FITZGERALD FRANKLIN,)
Defendant.)
No. 4:20 MJ 3155-1 NCC

MOTION FOR PRETRIAL DETENTION AND HEARING

COMES NOW the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Angie E. Danis, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As for its grounds, the Government states as follows:

1. Defendant is charged with an offense for which a maximum 20 year term imprisonment is prescribed under Title 21.
2. There is a serious risk that the defendant will flee.
3. The defendant is a threat to the community.

WHEREFORE, the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ Angie E. Danis

ANGIE E. DANIS, #64805MO
Assistant United States Attorney